

Exhibit M

1 --

2 UNITED STATES DISTRICT COURT

3 EASTERN DISTRICT OF NEW YORK

4 -----x

5 HILLARY LAWSON, KRISTINA HALLMAN,
6 STEPHANIE CALDWELL, MOIRA HATHAWAY,
7 MACEY SPEIGHT, ROSEMARIE PETERSON, and
8 LAUREN FULLER,

 Plaintiffs,
 Case No.
 1:17-cv-06404 (BMC)

9 -against-

10 HOWARD RUBIN, JENNIFER POWERS,
11 and the DOE COMPANY.

 Defendants.

12 -----x

13 October 10, 2018
14 10:22 a.m.

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19 Deposition of STEPHANIE D. SHON, taken by
20 Plaintiffs, pursuant to Notice, at the offices
21 of Balestriere Fariello, 225 Broadway, New
22 York, New York, before William Visconti, a
23 Shorthand Reporter and Notary Public within and
24 for the State of New York.
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31 ALSO PRESENT:
32 JENNIFER LEE, Para Balestriere Fariello
33 HOWARD RUBIN
34 JENNIFER POWERS
35 YIFAT V. SCHNUR, ESQ.
36 DAVID FORREST

37

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STEPHANIE D. SHON - 10/10/2018

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IT IS HEREBY STIPULATED AND AGREED

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by and between the attorneys for the

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respective parties herein that filing and

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sealing be and the same are hereby waived.

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IT IS FURTHER STIPULATED AND AGREED

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that all objections, except as to the form

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of the question, shall be reserved to the

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time of the trial.

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IT IS FURTHER STIPULATED AND AGREED

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that the within deposition may be signed

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and sworn to before any officer authorized

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to administer an oath with the same force and

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effect as if signed and sworn to before the

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Court.

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1 STEPHANIE D. SHON

2 freaking out. I'm also pregnant, I'm hormonal
3 and I think what I actually meant by that was I
4 wish I'd never introduced you to any of my
5 friends, to anyone because of this situation.
6 So indirectly I had reached out [REDACTED], I think
7 I'm venting here and my word choice was poor.

8 Q. You said you had reached out [REDACTED],
9 how do you reach out to [REDACTED]?

10 A. Initially I sent a blast, a mass
11 message to a bunch of girls, a bunch of models,
12 promotional models, playmates for an event that
13 was coming up that I was hosting, co-hosting or
14 working on and she was one of the ones that
15 responded.

16 Q. By the events that you were
17 co-hosting was that during your promotional
18 work that you discussed earlier?

19 A. No.

20 Q. What was this for?

21 A. Initially this was for a poker
22 tournament.

23 Q. What was that poker tournament
24 for?

25 A. It was for MS Hope For A Cure.

1 STEPHANIE D. SHON

2 [REDACTED] and Mr. Rubin?

3 A. I met [REDACTED] when she flew in for
4 the first time, yes.

5 Q. Where did you meet [REDACTED] when she
6 flew in for the first time?

7 A. I don't remember. I think it
8 might have even been -- it could have been a
9 restaurant or a bar or something.

10 Q. Was it at Mr. Rubin's apartment?

11 A. No.

12 Q. Was there ever a time that you
13 were in Mr. Rubin's apartment with [REDACTED]

14 A. Yes.

15 Q. I guess taking a step back. Have
16 you ever been in Mr. Rubin's apartment?

17 A. Yes.

18 Q. Do you know the address of that
19 apartment?

20 A. By apartment which one are you
21 referring to?

22 Q. I will take a step back.
23 Previously we mentioned through I believe it
24 was Exhibit B that there was a dungeon in one
25 of Mr. Rubin's apartments.

1 STEPHANIE D. SHON

2 A. Yes.

3 Q. Have you ever been in the
4 apartment with a dungeon?

5 A. Yes.

6 Q. Have you ever been in any other
7 apartment owned by Mr. Rubin?

8 A. No.

9 Q. Have you ever been in any other
10 property owned by Mr. Rubin?

11 A. Not to my knowledge.

12 Q. Were you ever in the apartment
13 with the dungeon with [REDACTED]

14 A. Yes.

15 Q. Have you ever been in the dungeon
16 with [REDACTED]

17 A. No.

18 Q. Do you know if [REDACTED] has
19 ever been in the dungeon?

20 A. No.

21 MR. GROSSMAN: I'm going to mark
22 this as Shon Exhibit C.

23 (Shon Exhibit C for identification,
24 WhatsApp message chain between Miss Shon
25 and Miss Powers.)

1 STEPHANIE D. SHON

2 A. Okay.

3 Q. Is the [REDACTED] you're referring to
4 [REDACTED], if you know?

5 A. Yes.

6 Q. And then at 11:39 p.m. you say,
7 "I wouldn't say very well not, but have talked
8 to her often and will be nothing like the last
9 girl." What do you mean by that?

10 A. I don't remember.

11 Q. Was there ever an incident with
12 another girl that you had introduced Mr. Rubin
13 to?

14 A. I don't remember.

15 Q. Then you say, "she does stuff like
16 this often and knows the expectations." Do you
17 remember why you wrote that?

18 A. Because [REDACTED] and I spoke and she
19 told me that she had done BDSM things with
20 other people that she was in relationships with
21 often and was excited. And when I say knows
22 the expectations, she knows exactly what she is
23 getting into.

24 Q. And by knows exactly what she is
25 getting into, do you mean you specifically

1 STEPHANIE D. SHON

2 spoke about what would occur between her and
3 Mr. Rubin?

4 A. Yes, as well as [REDACTED].

5 Q. Was that on a call, through texts
6 or in person or something else?

7 A. On a call and [REDACTED] talked to
8 her in person. They are both in Atlanta, so.

9 Q. Were you in Atlanta at this time?

10 A. No, I was in New York.

11 Q. You were in New York at this time?

12 A. Yes.

13 Q. To your recollection did [REDACTED]
14 [REDACTED] give you any specific instances of when
15 she experienced BDSM prior to this?

16 A. Yes. She sent pictures of her
17 tied up with Howie.

18 Q. And are those the pictures further
19 back in Exhibit C on page 699, 700?

20 A. No.

21 Q. There are other pictures that she
22 sent?

23 A. Yes.

24 Q. Did you forward those pictures to
25 Mr. Rubin?

1 STEPHANIE D. SHON

2 send you contracts for tonight and we could
3 sign them tomorrow." Do you remember having
4 that conversation?

5 A. I don't remember having it, but
6 seeing it, yes.

7 Q. Did you tell [REDACTED] about the
8 NDA prior to her travel to New York?

9 A. Yes.

10 Q. What did you tell her about the
11 NDA?

12 A. I told her that there would be a
13 NDA that she needs to read and sign if she
14 wants to have a relationship with Howie.

15 Q. Did you tell her anything else
16 about the NDA?

17 A. No.

18 Q. At 7:35 when you mentioned, "Oh
19 yea, I will send you contracts for tonight and
20 we could sign them tomorrow" what contracts
21 were you referring to?

22 A. I don't know and I don't remember
23 because I never had any -- I never had any
24 contracts that I would send her or give to her.

25 Q. You weren't referring to the NDA

1 C E R T I F I C A T E

2 STATE OF NEW YORK)

3 : ss.

4 COUNTY OF NEW YORK)

5 I, WILLIAM VISCONTI, a Shorthand Reporter and
6 Notary Public within and for the State of New York,
7 do hereby certify:

8 That prior to being examined, the witness named in
9 the foregoing deposition was duly sworn to testify the truth,
10 the whole truth, and nothing but the truth;

11 That said deposition was taken down by me in
12 shorthand at the time and place therein named and
13 thereafter reduced by me to typewritten form and that the
14 same is a true, correct, and complete transcript of said
15 proceedings.

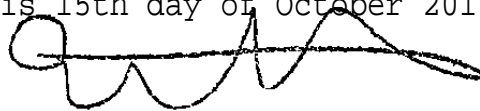
16 Before completion of the deposition, review of the
17 transcript [] was [X] was not requested. If requested,
18 any changes made by the deponent (and provided to the
19 reporter) during the period allowed are appended hereto.

20 I further certify that I am not interested in the
21 outcome of the action.

22 Witness my hand this 15th day of October 2018.

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WILLIAM VISCONTI

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